

VIA FEDERAL EXPRESS

October 15, 2003

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Fl. 2
Boston, Massachusetts 02110

Re: Verizon Proposed Tariff Revisions to Tariff M.D.T.E. No. 17

Dear Ms. Cottrell:

Sprint Communications Company L.P. (“Sprint”) respectfully submits this letter in lieu of comments in response to Verizon Massachusetts’ (“Verizon’s”) proposed revisions to Tariff M.D.T.E. No. 17 purporting to comply with the FCC’s Triennial Review Order.¹ Verizon’s proposed DTE MA NO. 17 revisions should be suspended while the Department evaluates the proposed tariff revisions and investigates Sprint’s and other competitive local exchange companies (“CLECs”) concerns with the proposed tariff revisions. As noted below, there should be a 60-day transition period prior to disconnecting OC3, OC2 or STS 1 IOF transport.

¹*In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket No. 01-338, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, FCC 03-36 (rel. August 21, 2003), *hereinafter* “TRO”.

*There Should Be A 60-Day Transition Period Prior to Disconnecting OC3, OC2 or STS
1 IOF Transport*

The proposed tariff revisions would discontinue existing OC3, OC12 and STS1 IOF transport arrangements on November 1, 2003, except as otherwise required under an effective interconnection agreement between Verizon and the competitive telecommunications carrier.² While Sprint appreciates Verizon subjecting disconnection of these transport arrangements to the terms of an effective interconnection agreement between Verizon and the impacted carrier, the interconnection agreement may or may not provide for an adequate transition period. As presently worded, the disconnection would be effective on the same day, November 1, 2003, that the tariff becomes effective. Sprint recommends a longer (*e.g.*, 60 day) transition period, such as a January 2, 2004 disconnection effective date, to allow CLECs an opportunity to transition to other facilities such as special access. "November 1, 2003" should be changed to "January 2, 2004" on Part B Section 2, Pages 1.1 and 2 of the first revision to DTE MA No. 17.

Thank you for your cooperation.

Very truly yours,

Craig D. Dingwall

cc: Mike Isenberg, Director, Telecommunications Division
April Mulqueen, Assistant Director, Telecommunications Division
Paula Foley, Assistant General Counsel

² DTE MA No. 17, Miscellaneous Network Services, Part B Section 2, Pages 1.1 and 2, First Revision Canceling Original.